

November 6, 2019

BY ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: *Ex Parte* Communication in: MB Docket No. 18-349 (Quadrennial Review); MB Docket No. 19-275 (NBI Holdings, LLC; Cox Enterprises, Inc.; and Terrier Media Buyer, Inc.)

Dear Ms. Dortch:

On November 4, 2019, representatives of the American Television Alliance and its members spoke with Media Bureau staff regarding the local media ownership rules. Present on behalf of ATVA were Executive Director Mike Chappell, Mike Nilsson (HWG), Maureen O'Connell (Charter), Hadass Kogan (DISH), Ross Lieberman (ACA Connects), and Stacy Fuller (AT&T). Present on behalf of the Bureau were Michelle Carey, Barbara Kreisman, Sarah Whitesell, Brendan Holland, Ty Bream, Chad Guo, David Brown, and Chris Robbins.

We discussed loopholes in the Commission's rules that permit broadcasters to create local duopolies, triopolies, and even quadropolies—in each case notwithstanding the nominal prohibition on such top-four combinations. In doing so, we expressed our opinion (detailed in our comments in the Quadrennial Review proceeding) that the Commission should eliminate these loopholes.¹ We also expressed our view (detailed in our comments in the Apollo transaction) that it would not serve the public interest to allow Apollo to acquire a top-four quadropoly in Greenville, Mississippi—an arrangement that has helped Northwest command among the highest retransmission consent fees in the nation.²

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¹ Comments of the American Television Alliance, MB Docket No. 18-349 at 14 (filed Apr. 29, 2019).

² *Id.* at 13.

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In accordance with the Commission's rules, I will file one copy of this letter electronically in each of the dockets listed above.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Michael Nilsson", with a stylized flourish at the end.

Michael Nilsson
Counsel to the American Television Alliance

CERTIFICATE OF SERVICE

I, Michael Nilsson, hereby certify that on November 6, 2019, I caused true and correct copies of the foregoing to be served by overnight or first-class or (where indicated by an asterisk) electronic mail upon the following:

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/s/ Michael Nilsson